



January 14, 2019

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Expanding Flexible Use of the 3.7 GHz to 4.2 GHz Band, GN Docket No. 18-122
Ex Parte Letter

Dear Ms. Dortch:

Globecast America, Inc (“Globecast”) urges the Federal Communications Commission (“Commission”) to dismiss recommendations by T-Mobile USA, Inc. (“T-Mobile”) and the Competitive Carriers Association (“CCA”) to repurpose 300 MHz or more of 3.7-4.2 GHz band (“C-band”) spectrum for flexible use.¹ These flawed proposals show complete disregard for the amount of spectrum needed to protect incumbent Fixed Satellite Service (“FSS”) operations in the band, which support distribution of audio and video content to more than 100 million American households.

Globecast continues to support the C-Band Alliance proposal, because unlike the proposal of the C-Band Alliance to repurpose 200 MHz of C-Band spectrum, including a guard band, Neither T-Mobile’s nor CCA’s proposal would preserve nearly enough spectrum to support these critical incumbent FSS operations in the C-band. T-Mobile suggests the FCC auction all 500 MHz of the C-band for terrestrial mobile broadband, and at least 300 MHz in most markets. CCA advises clearing a minimum 320 MHz, including a 20 MHz guard band.

Globecast depends upon the broad coverage and unparalleled reliability of C-band content distribution to distribute breaking news, live sports and entertainment programming throughout the entire United States. These services, when taken in combination with the multitude of audio and video programming provided by other content providers, require much more C-Band spectrum dedicated to satellite services than the T-Mobile and CCA proposals would allow.

Moreover, there is no suitable alternative to C-band. Ku- and Ka-band spectrum lack the capacity and operational performance characteristics to meet our quality and reliability requirements, and fiber networks have limited reach and are cost prohibitive. The FCC must preserve sufficient C-band spectrum – at least 300 MHz – to ensure continuation of incumbent FSS operations.

¹ See Notice of Ex Parte, T-Mobile USA, Inc., GN Docket No. 18-122 (filed Dec. 13, 2018); Notice of Ex Parte, Competitive Carriers Association, GN Docket No. 18-122 (filed Dec. 20, 2018).



Because both the T-Mobile and CCA proposals would result in content providers losing access to the cost-effective, high quality distribution C-band satellite service upon which they rely, the proposals are simply not viable. Globecast urges the Commission to protect FSS use in the C-band and dismiss these proposals that threaten American consumers' access to the audio and video services they enjoy today.

Respectfully submitted,



A handwritten signature in black ink, appearing to read "Eddie Ferraro", written over a horizontal line.

Eddie Ferraro
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